## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

In re:	)
	)
EAGLE PROPERTIES AND	) Bankruptcy Case
INVESTMENTS, LLC,	) No. 23-10566-KHK
	) Chapter 7
Debtor.	)
	)

CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING ON (MOTION TO EXPEDITE HEARING AND SHORTEN NOTICE PERIOD ON (I) CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF 1630 E. CHOCOLATE AVE, HERSHEY, PA FREE AND CLEAR OF LIS PENDENS PURSUANT TO 11 U.S.C. §§ 363(f) AND 554; (II) CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF 71 LUCY AVENUE, HUMMELSTOWN, PENNSYLVANIA; (III) CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF 445 WINDOVER AVE, NW, VIENNA, VA FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(f); (IV) CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF 1010 LYNN ST., SW, VIENNA, VA FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(f); AND (V) CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF 449 LAWYERS RD, NW VIENNA, VA FREE CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(f); AND (VI) CHAPTER 7 TRUSTEE'S MOTION TO APPROVE SALE OF 1203 COTTAGE STREET, SW, VIENNA, VA FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(f)

I HEREBY CERTIFY, as a member of the Bar of this Court, that I have carefully examined this matter and that there is a true necessity for an expedited hearing.

I CERTIFY FURTHER that the necessity for this expedited hearing has not been caused by any lack of due diligence on my part but has been brought about only by the circumstances of this case.

I CERTIFY FURTHER that I have made a *bona fide* effort to resolve this matter and that, at the time of filing the motion to expedite, the matter cannot be resolved without a hearing.

Dated this 25th day of April, 2024.

/s/ Dylan G. Trache

Dylan G. Trache, Va. Bar No. 45939 NELSON MULLINS RILEY & SCARBOROUGH LLP 101 Constitution Avenue, NW, Suite 900 Washington, DC 20001

Telephone: (202) 689-2800 Facsimile: (202) 689-2860

Email: dylan.trache@nelsonmullins.com

Counsel to the Chapter 7 Trustee